




APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 01/24/2024

VIA ECF AND ELECTRONIC MAIL

Honorable Vernon S. Broderick
United States District Judge, SDNY
40 Foley Square
New York, New York 10007

Ms. Plaza is to surrender to her designated BOP facility on the earlier of either 1) seven-days after she receives notification of her BOP designation, or 2) Friday, February 23, 2024. It is further ordered that Ms. Plaza report to Pretrial Services the day before her surrender date for the removal and return of her monitoring equipment.

Re: ***United States v. Zukeila Plaza***, 22 Cr. 142 (VSB)

Dear Judge Broderick:

We respectfully write in connection with the upcoming surrender of Zukeila Plaza to serve the 60-month sentence imposed by the Court on December 15, 2023.

First, the defendant respectfully requests that the Court extend Ms. Plaza's surrender date from Friday, January 26, 2024 at 2 p.m., to the **earlier** of either 1) seven-days after she receives notification of her BOP designation, or 2) Friday, February 23, 2024. Since her sentencing, Ms. Plaza has been in complete compliance with the terms of her pretrial release. However, as of today, the BOP has **not** designated Ms. Plaza to any facility. Should Ms. Plaza surrender on Friday, she likely will be held at MDC Brooklyn until such time as she is designated. After that, she will be transported via the USMS to her designated facility, which can be a circuitous journey. Given Ms. Plaza's total compliance with pretrial supervision throughout this matter, BOP's has failure to designate Ms. Plaza despite having over a month to do so and the fact that Ms. Plaza would unnecessarily be subjected to the conditions at MDC and a subsequent prisoner transfer, we respectfully submit such a limited extension is warranted. The Government opposes Ms. Plaza's application.

Second, Ms. Plaza's Pretrial Supervision officer (copied here) has requested that Ms. Plaza report to Pretrial Services the day **before** her surrender date to remove and return her monitoring equipment. Our understanding is that this request must be made through counsel and authorized by the Court. The Government advised counsel that it defers to Pretrial Services on this request.

We appreciate the Court's consideration of these applications.

Respectfully submitted,

/s/ John Zach
John T. Zach

Copies to:
AUSA Wright (via ECF)
Intensive Supervision Specialist Francesca A. Piperato (via email)

BOIES SCHILLER FLEXNER LLP